

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - : SUPERSEDING INFORMATION
:
JOSEPH L. JUNKOVIC, : S1 13 Cr. 682 (KBF)
:
Defendant. :
- - - - - X

COUNT ONE

(False Statements Relating to a Health Care Program)

The United States Attorney charges:

1. From at least in or about April 2008, up to and including in or about September 2011, in the Southern District of New York and elsewhere, JOSEPH L. JUNKOVIC, the defendant, in a matter involving a health care benefit program, willfully and knowingly made materially false, fictitious, and fraudulent statements and representations, and made and used materially false writings and documents knowing the same to contain materially false, fictitious, and fraudulent statements and entries, in connection with the delivery of or payment for health care benefits, items, or services, to wit, JUNKOVIC submitted false and fraudulent invoices to the New York State Department of Health in connection with his role in administering cancer screening services for indigent New Yorkers.

(Title 18, United States Code, Section 1035.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Superseding Information, JOSEPH L. JUNKOVIC, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(7), all property, real and personal, that constitutes or is derived, directly or indirectly, from gross proceeds traceable to the commission of the offense, including but not limited to the following:

a. At least \$360,556 in United States currency, in that such sum in aggregate is property representing the amount of proceeds obtained as a result of the offense alleged in Count One of this Superseding Information.

SUBSTITUTE ASSET PROVISION

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

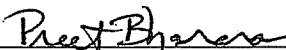
(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.

(Title 18, United States Code, Section 982 and Title 21, United States Code, Section 853.)



PREET BHARARA

United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

JOSEPH L. JUNKOVIC,

Defendant.

INFORMATION

S1 13 Cr. 682

(18 U.S.C. §§ 641, 1341)

PREET BHARARA

United States Attorney.
